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UBER TECHNOLOGIES, INC.  
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC,  
  
Plaintiff,  
  
v.  
  
UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING LLC,  
  
Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MEREDITH  
DEARBORN IN SUPPORT OF  
DEFENDANTS UBER  
TECHNOLOGIES, INC.'S AND  
OTTOMOTTO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL PORTIONS AND  
EXHIBITS TO DEFENDANTS' REPLY  
IN SUPPORT OF MOTION TO  
ENFORCE THE COURT'S JUNE 7,  
2017 ORDER**

Judge: Hon. William H. Alsup  
Trial Date: October 10, 2017

I, Meredith Dearborn, declare as follows:

1. I am a partner at the law firm of Boies Schiller Flexner LLP representing Defendants Uber Technologies Inc. and Ottomotto LLC (collectively, “Uber”) in this matter. I am a member in good standing of the Bar of the State of California. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Uber’s Administrative Motion to File Under Seal Portions and Exhibits to Defendants’ Reply in Support of Motion to Enforce the Court’s June 7, 2017 Order.

2. I have reviewed the following exhibits and confirmed only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Defendant Uber Technologies, Inc. and Ottomotto, LLC’s Reply in Support of Motion to Enforce the Court’s June 7, 2017 Order (Dkt. 563), to Strike Plaintiff Waymo LLC’s Corrected Supplemental Initial Disclosures, and to Preclude Damages Claims And Certain Witnesses (“Reply”)	Highlighted Portions	Plaintiff
Exhibit 2 to Dearborn Decl.	Highlighted Portions	Plaintiff
Exhibit 4 to Dearborn Decl.	Entire document	Plaintiff

3. The highlighted portions of the Reply and Exhibit 2 and the entirety of Exhibit 4 contain information that I understand has been designated by Waymo as “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” under the Protective Order.

4. Defendants’ request to seal is narrowly tailored to the specific exhibits that merit sealing.

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1 I declare under penalty of perjury that the foregoing is true and correct. Executed this  
2 24th day of July, 2017 at Oakland, California.

3  
4 Dated: July 24, 2017

BOIES SCHILLER FLEXNER LLP

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6 By: /s/ Meredith R. Dearborn  
Meredith Dearborn

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9  
10 **ATTESTATION OF E-FILED SIGNATURE**

11 I, Karen L. Dunn, am the ECF User whose ID and password are being used to file this  
12 document. In compliance with General Order 45, X.B., I hereby attest that Meredith Dearborn  
13 has concurred in this filing.

14 Dated: July 24, 2017

15 /s/ Karen L Dunn  
Karen L. Dunn